

REMARKS/ARGUMENTS

Amendments

Before this Amendment, claims 1-38 were present for examination. Claims 1-4, 8, 14, 16-24, 27-29, 31-35, 37 and 38 are amended, and claims 9-13 are canceled. The amendments are fully supported by the original specification. *See*, for example, paragraphs [0113], [0144], [0145], [0151] and [0177]-[0179] of the publication of the subject application. Therefore, claims 1-8 and 14-38 are presented for examination, and claims 1, 14, 27, and 33 are the independent claims. Applicants respectfully request reconsideration of this application.

The Office Action has rejected claims 1-10 and 14-23 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Davis et al., U.S. Patent No. 5,764,980 (“Davis”), in view of the cited portions of Gagné, U.S. Patent No. 6,353,437 (“Gagné”). The Office Action has also rejected claims 11-13 and 24-26 under 35 U.S.C. §103(a) as being unpatentable over Davis, in view of Gagné, and further in view of the cited portions of Gardner et al., U.S. Patent Publication No. 2004/0225608 (“Gardner”). The Office Action has also rejected claims 27-38 under 35 U.S.C. §103(a) as being unpatentable over Gagné, in view of the cited portions of Turner, et al., U.S. Patent No. 6,747,650 (“Turner”).

Interview Summary

Applicants thank the Examiner for taking the time to discuss this application during our August 3, 2010 interview. Participants included the undersigned, Kate Gaudry, the Examiner, and the Examiner’s supervisor. Possible amendments were discussed along with some context for the present invention.

35 U.S.C. §103 Rejections

Claims 1 and 14

The Office Action rejected independent claim 1 under 35 U.S.C. §103 as being unpatentable over Davis, in view of Gagné. To establish a *prima facie* case of obviousness, the cited references, combined with the knowledge of those of ordinary skill in the art, must teach or

suggest all the claim limitations. *See, e.g., DyStar Textilfarben GmbH & Co. Deutschland KG v. C.H. Patrick Co.*, 464 F.3d 1356, 1360 (Fed. Cir. 2006); *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741 (2007) (“a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art”). Applicants respectfully traverse this rejection at least because the combinations of Davis, Gagné, and ordinary knowledge in the art fails to teach or suggest all the recitations of independent claim 1.

Claim 1 has been amended to indicate that the reusable resource comprises a scene and/or an animation character. Further, the claim indicates that at least one of the reusable resources comprises multiple independent components, each component comprising a feature of the human race (*e.g.*, eyebrows – see paragraph [0145]) or an object (*e.g.*, a chair – see paragraph [0177]). For example, the subject specification gives an example of a scene including the independent components of a chair and a floor. This allows multiple artists to collaborate in the production of an animation feature, while still maintaining consistency in scenes and characters. The claim then indicates that when a segment of the animation project is changed in a manner that relates to a first component of a reusable resource, a second component of the reusable resource is provided to the remote computer that sent the change. For example, if an artist decided to include a particular kitchen table in a segment of the project, a reusable-resource kitchen scene may indicate that that table should be associated with other kitchen objects (*e.g.* a chair), and thus, the chair may be provided to the artist to include in the segment.

Applicants submit that neither reference teaches or suggests of a global-animation system as recited in the amended claim. For example, neither reference relates to the particular type of reusable resources defined in the claim (where at least one reusable resource comprises multiple independent components). Further, neither reference relates to auditing changes to determine whether the changes relate to one of the multiple independent components of the reusable resource. Gagné, for example, merely relates to a single animator creating a rule-based group (*see, e.g.*, column 3, lines 14-20).

For at least these reasons, the Office Action fails to establish a *prima facie* case of obviousness as to independent claim 1, and Applicants respectfully request that the §103 rejection to claim 1 be withdrawn.

For at least similar reasons, applicants submit that claim 14 and claims dependent thereon are not obvious over Davis and Gagné. Additionally, Applicants submit that neither reference teaches or suggests “assigning at least one individual task associated with the animation project to an artist from a group of available artists at least partially as a function of a nationality or a geographic location associated with the artist and a national law or an international treaty”. Neither reference discloses anything related to a nationality, a geographic location associated with the artist, a national law or an international treaty. Therefore, Applicants respectfully request that the §103 rejections to claim 14 thereon be withdrawn.

Claims 27 and 33

The Office Action has rejected independent claims 27 and 33 under 35 U.S.C. §103(a) as being unpatentable over Davis in view of Turner. (Applicants note that the Action states that these claims are rejected over Gagné in view of Turner, but the cited sections of “Gagné” correspond to the Davis reference, not Gagné.) To establish a *prima facie* case of obviousness, the cited references, combined with the knowledge of those of ordinary skill in the art, must teach or suggest all the claim limitations. Applicants respectfully traverse this rejection at least because the combination of Gagné, Turner, and ordinary knowledge in the art fails to teach or suggest all the recitations of claims 27 and 33.

Claims 27 and 33, as amended, relate to a method and system for searching reusable resources that comprise at least one of a scene and an animation character to identify a reusable resource that comprises a first component comprising an object or feature. Thus, for example, if an artist decides to put a chair into a segment of an animation project, then the method may search for scenes that include that chair. The method then determines that the identified reusable resource comprises a second independent component (*e.g.*, a floor). Thus, when a change related to the first component is made during development of an animation

object, a computer is notified that the reusable resource creates a dependency between the first and second components. For example, a kitchen scene indicates that a particular floor tile is always associated with a particular kitchen chair.

Neither of the cited references discloses such a method or system for searching for reusable resources. For example, Davis relates to searching a database for requested scenes such that users can modify the scenes. *See, e.g.*, column 11, line 53-column 12, line 60. Thus, nowhere does Davis teach or suggest “in response to a change related to the first component during development of an animation object on a computer, sending notification to the computer indicating that the reusable resource creates a dependency between the first component and the second component”. This is because, in Davis, the search is not so much for a general scene that may be used multiple times during an animation project, but rather for particular frames that the user is to edit.

Turner relates to visualization of data (*e.g.*, weather data) using animation. (*See, e.g.*, Figures 10-13 and the associated text.) It does not relate to a reusable characteristic comprising a scene or animation character, or “in response to a change related to the first component during development of an animation object on a computer, sending notification to the computer indicating that the reusable resource creates a dependency between the first component and the second component”. There is not even any teaching or suggestion of any change relating to a first component during development of an animation object, much less that any action is taken in response to such a change.

For at least these reasons, both Davis (“Gagné”) and Turner fail to teach or suggest the recitations of independent claims 27 and 33. Further, the Office Action does not provide any teaching from other art or reason why this recitation would be within the knowledge of a person of ordinary skill in the art. As such, the combined teachings of the art, as cited by the Office Action, fail to establish a *prima facie* case of obviousness as to independent claims 27 and 33, and Applicants respectfully request that the §103 rejections be withdrawn.

Dependent Claims

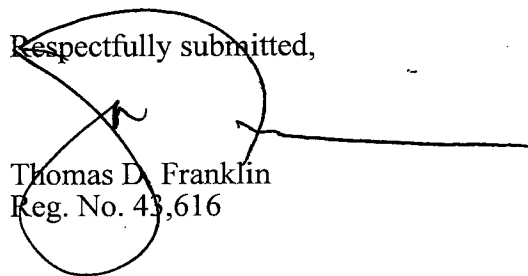
For at least the above reasons, Applicants submit that independent claims 1, 14, 27, and 33 are allowable. Applicants further submit that claims 2 – 13, 15 – 26, 28 – 32, and 34 – 38 are allowable at least because of their dependence from allowable base claims. Applicants further submit that Gardner does not cure the above-described deficiencies with respect to Claims 13 and 26. As such, the cited art fails to establish a *prima facie* case of obviousness as to the dependent claims, and Applicants respectfully request that the § 103 rejections to all the claims be withdrawn.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,


Thomas D. Franklin
Reg. No. 43,616

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000
Fax: 415-576-0300
62769831 v1